

EXHIBIT 3
Redactions Approved
per Court Order
(ECF No. 232)

1 - TARIQ SHAUKAT -

2
3 IN THE UNITED STATES DISTRICT COURT
4 FOR THE SOUTHERN DISTRICT OF NEW YORK
5 ----- X
6 ULKU ROWE,

7 Plaintiff,

8 Case No.
9 19 Civ. 08655 (LGS) (GWG)

10 v.

11 GOOGLE LLC

12 Defendant.
13 ----- X

14 DATE: October 15, 2020

15 TIME: 9:34 a.m.

16 VIDEOTAPED VIDEOCONFERENCE DEPOSITION
17 OF TARIQ SHAUKAT, held via Zoom, pursuant to
18 Notice, before Hope Menaker, a Shorthand Reporter
19 and Notary Public of the State of New York.
20
21
22
23
24
25

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2 Q. So you learned of it sometime around
3 the time of its filing; is that correct?

4 A. Yes.

5 Q. And what is your understanding of
6 what this lawsuit is about?

7 A. My general understanding is it's in
8 relation to the role of head of financial services
9 in Google Cloud.

10 I apologize, the gardener just showed
11 up. Let me shut the door here. You may not be
12 able to hear, my apologies.

13 My understanding is it's in relation
14 to her applications for the head of financial
15 services for Google Cloud and the fact that she
16 did not get that role.

17 Q. Anything else that you understand
18 about the claims that she's asserted in this case?

19 A. Not specifically to this case, no. I
20 have not reviewed, as I mentioned, the -- the
21 Complaint.

22 Q. What's your understanding of how you
23 relate to this lawsuit?

24 A. I was hiring manager for that
25 position and so that's my -- my understanding as

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2 to what -- my relationship.

3 Q. How old are you, Mr. Shaukat?

4 A. I'm [REDACTED]

5 Q. And what is your highest level of
6 education?

7 A. I have two Master's degrees; one in
8 mechanical engineering and the other in public
9 policy.

10 Q. And when did you graduate with your
11 second Master's?

12 A. That would be early 1997, either
13 January or February.

14 Q. And when -- and which Master's degree
15 was that?

16 A. That was the public policy degree.

17 Q. And when did you get your mechanical
18 engineering Master's?

19 A. 1995, June of 1995.

20 Q. And so did you go immediately from
21 your Master's in mechanical engineering to pursue
22 your Master's of public policy?

23 A. I did, yes.

24 Q. And when did you receive your
25 undergraduate degree?

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2 contemplated or discussed or organ -- organizing
3 by industry?

4 A. One of the first initiatives that I
5 kicked off when I joined was a reorganization of
6 those teams so that we could have an integrated
7 go-to-market team, as we thought of it, as opposed
8 to what I inherited was a series of product silos.

9 We had a G-suite team, we had a
10 Google Cloud team, an Android For Work team, et
11 cetera and so the initial -- well, one of the
12 initial efforts that I launched was a
13 reorganization and part of that was an
14 organizational design exercise in which we did
15 contemplate forming industry-specific teams. This
16 would have been in 2016, and we decided to have
17 that in the terminology we used as a minor, not a
18 major. We decided that the major would be
19 regional and the industry would be the minor.

20 Q. Okay. Are you familiar with the term
21 "verticals" as it was used at Google? Are you
22 familiar with the term "verticals" as that term
23 was used at Google?

24 A. I am, yes.

25 Q. And what do you understand that term

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2 to mean?

3 A. Within Google Cloud it generally
4 refers to industries.

5 Q. And are you familiar with the term
6 "verticalization"?

7 A. I am, yes.

8 Q. And what does that refer to?

9 A. Again, within Google Cloud we refer
10 to it as -- we use that term to talk about
11 organizing by vertical.

12 Q. So at the time you joined at Google
13 Cloud, was it in any way organized by verticals?

14 A. Honestly I don't recall specifically
15 the details, but there were some teams in some of
16 the product areas that I mentioned that did focus
17 on a particular vertical. I don't recall if they
18 were specifically organized by vertical, but there
19 were certain individuals with a vertical focus.

20 Q. At the time you joined Google, was
21 there a financial services vertical?

22 A. At the time I joined there were
23 individuals who focused on financial services. We
24 did not have a formal designation of there being a
25 vertical at that time, that -- that I know of

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2 Q. And what about Mr. Breslow's
3 background made him an ideal candidate for
4 that -- for that role?

5 A. Stuart had been a longtime chief
6 compliance officer to highly-respected
7 financial institutions in the field of compliance
8 specifically, so Morgan Stanley and then Credit
9 Suisse.

10 Before that he also had been a
11 partner, subsequent to those experiences, at
12 McKinsey focusing specifically on topics such as
13 anti-money laundering, which was a very
14 high-interest area for us from a product
15 standpoint as well and so he -- and so he had both
16 the -- and he had published a paper, I recall is
17 the way we found him, on anti-money laundering
18 that was quite influential on how we were thinking
19 about the anti-money laundering space.

20 Q. Didn't he actually come to be known
21 to Google through Ruth Porat?

22 A. He did not, no. At least, not to my
23 knowledge. I -- I -- Ruth was not the person who
24 identified him to me.

25 Q. And so you're not aware that he was

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2 internal communications team that wrote them and I
3 sent them after reviewing them.

4 Q. Was this consistent with your
5 understanding of his background?

6 A. Generally speaking, yes.

7 Q. Okay, you can put that aside.

8 How did it come to be that Ms. Rowe
9 was moved into your organization?

10 A. So there were always -- since the
11 hiring, which as I mentioned was unexpected for me
12 of these vertical specific people in OCTO, there
13 was always -- or there -- there was a level of
14 conflict and misalignment that -- that existed and
15 kept getting called to light by either customers
16 or by our teams, and in my role that would be the
17 sales and go-to-market teams; and so there was an
18 ongoing discussion that existed for quite a while.
19 I don't recall the exact length of time, but
20 almost from the -- the earliest days of these
21 industry-specific people being in OCTO about the
22 conflict, how do we resolve the conflict.

23 Will, Brian, and I tried a number of
24 different avenues to try and resolve the conflicts
25 that existed and at some point in late 2017 after

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2 the reorganization I mentioned with me taking over
3 the industry teams, we decided -- "we" being Diane
4 Greene, myself and Brian -- to move the
5 vertical-specific OCTO people into the vertical
6 teams so that we were building. And so that was
7 the decision that we made, again, late '17/early
8 '18 and it then took a little while for us to work
9 out the details and -- and figure out how to do
10 it, what the roles were, et cetera.

11 Q. And so with respect to the OCTO
12 vertical folks, was the agreement that if
13 they -- they would move over into your
14 organization?

15 A. That was the agreement that I had
16 with Brian Stevens and Diane Greene, yes.

17 Q. And that they could either have a
18 team to lead or they could continue in a -- in a
19 tech advisor-type role --

20 MR. GAGE: Objection.

21 Q. -- correct.

22 A. That is not correct. The idea was
23 that they would move into a role that we were
24 calling the Global Client Technical Lead Role and
25 that they would build out a team there to do that.

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2 a.m. and we're going off the record.

3 (Whereupon, there was a brief recess
4 in the proceedings.)

5 THE VIDEOGRAPHER: The time is 11:56
6 a.m. and we're back on the record.

7 Q. So before we broke, you were telling
8 me about a conversation that you had with Ms. Rowe
9 regarding her move into the -- into your
10 organizational unit and you said it would have
11 been somewhere in the 30 to 60- minute range. Do
12 you recall whether you were physically present
13 together or whether there was some other mode of
14 communication?

15 A. I don't recall specifically. We
16 had -- we were based in different offices so, it
17 would not be atypical for it to have been
18 videoconference.

19 Q. Where were you based?

20 A. In Sunnyvale, California.

21 Q. Okay, and can you tell me everything
22 that you recall being said in that conversation?

23 A. I recall walking her through
24 basically what the content of the note that I
25 subsequently sent out was describing, the

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2 organizational structure that we had in place. So
3 I described that we were standing up a group that
4 we called the Global Client Lead Group and that
5 that team would be focused on the business and
6 business development and -- but dedicated to a
7 specific list of clients that we called the Global
8 Client List; and that we were also setting up a
9 team that we called the Global Client Technical
10 Lead Team and that that team would be peers of the
11 GCLs, as we referred to them Global Client Lead,
12 but focused more on the technical aspect. I
13 explained that these would be focused on the
14 priority list of clients that we would be
15 developing. By "we" I mean myself, the sales
16 leadership, and Diane would be developing.

17 We would assign a list to each of the
18 GCLs and the GCTLs, the again Global Client
19 Leads and the Global Client Technical Leads, and
20 that -- and that those individuals would be
21 expected to really be the sponsors and actively
22 engaged in what I call the persistent manner in
23 those different accounts. So there was a -- a
24 discussion about that. Those were both new
25 functions or new characterizations and new

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2 designations that we had and so I walked her
3 through that.

4 I walked her through what the other
5 roles in the industry were going to be; meaning we
6 had a product lead, we had an engineering lead, we
7 had an industry lead, and dotted-line marketing
8 lead, and I think that's it. And so I recall
9 us -- me laying that out for her, explaining what
10 the role would be, explaining that her role would
11 be to come in and do the global client technical
12 lead, that this would look and feel and roles and
13 responsibilities would be broadly in line with
14 what she had been expected to be doing inside of
15 OCTO with the possible exception that there would
16 be a designated or a -- a specified list of
17 clients that she was personally responsible for
18 managing.

19 That had been the practice that Will
20 Grannis and I had with OCTO historically, but I
21 don't know in -- in the conversations Ulku
22 expressed surprise, surprised that she would be
23 restricted to a certain number of accounts, that
24 she would be asked to focus on a specific list of
25 accounts, which led me to believe that possibly

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2 Will did not manage it in the way that he and I
3 had agreed that he would manage the -- the team.

4 Q. Do you recall anything she said to
5 you that you've not shared so far?

6 A. A couple of things. One was the
7 surprise, as I mentioned. A lot of clarification
8 about why the specifics to specific accounts, what
9 account would they be. I told her that they were
10 still in -- a work in process, but they would be
11 kind of the who's who of the financial services
12 world, our top target accounts. So she expressed
13 surprise about that.

14 She expressed some -- dislike is
15 probably the right way to -- to say it, that she
16 was not happy with that focus that I was asking
17 for on specific global -- on specific accounts and
18 the persistent nature of the relationship. She
19 was very keen to understand the relationship
20 between the global client lead and the global
21 client technical lead and -- and the type of
22 person we would be hiring into each one of those.

23 She was very curious as to whether
24 she would be asked to build out a team or not or
25 the global client lead and I did explain to her

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2 that this is -- we are expecting her to come in
3 and build a team and lead a team of global client
4 leads, but this was what I called the Player Coach
5 Role, right, where she would both manage a team,
6 but also be expected to have a certain number of
7 accounts that she was personally responsible and
8 accountable for.

9 Q. And so at the time you had this
10 conversation with her, you had already had the
11 conversation where HR had shared with you
12 background information of her level, correct?

13 A. Yes, that would be true.

14 Q. Anything else you recall her saying
15 to you in this conversation?

16 A. Not really except, as I mentioned,
17 she expressed her displeasure. I think she said,
18 I have go away and think about this and I may have
19 more questions. Or at least that's my
20 recollection, that she said something to that
21 effect.

22 Q. Was there any discussion with respect
23 to the VP of financial services role in this
24 conversation?

25 A. Not that I recall.

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2 MR. GAGE: Objection.

3 A. I know we didn't have any finalists,
4 but apart from that I don't recall the status.

5 Q. Okay. You say in your proposed
6 response to her, "I'm happy" -- and I'm looking
7 now at the first page on your response, the first
8 paragraph toward the end. You say, "I'm happy to
9 have you lead the team if you would like to do
10 that as well. So recognize your current role is
11 an IC role, but if you prefer not to do that we
12 can certainly adjust." Do you see that?

13 A. I do, yes.

14 Q. Does "IC" refer to individual
15 contributor?

16 A. Yes.

17 Q. And so am I correct that you were
18 indicating that her role could either be an IC or
19 a manager role under you?

20 A. If -- if she expressed a preference
21 that -- but my preference was that she would lead
22 the team and if she expressed a preference to
23 maintain her individual contributor status which
24 is what she had been, then I was happy to discuss
25 and adjust.

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2 Q. And is that what happened, did she
3 maintain the IC or did she become a manager?

4 A. Honestly, as you can see from her
5 e-mail, she declined the role which led us to a
6 fairly ambiguous state, which technically I was
7 confused as to whether she actually resigned as I
8 mentioned in my -- in my notes here.

9 And so when -- but we ended up not
10 building out this team in any level of detail and
11 so she was in IC simply because she didn't hire
12 anyone on the team, but not by design at that
13 point; but that specific point I don't recall her
14 responding with yes, I would like to manage the
15 team. Instead, as -- as you saw, she responded
16 with I decline the role which was much more
17 ambiguous.

18 Q. Well, let's go back to the Box and,
19 again, you may need to refresh and we're going to
20 look at Tab 25.

21 A. Yes, I have it.

22 Q. Okay.

23 MS. GREENE: We're going to mark
24 this as Exhibit 30. It has a Bates stamp of
25 G0 -- GOOG-ROWE-P-00000726 through 727.

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2 in a Google Doc or other some other form. I
3 just -- I don't know what his practice was. I
4 know what he showed me, which was -- and the
5 discussion that we had.

6 Q. Particularly with respect to Jason?

7 A. No, in -- in general.

8 Q. Okay. What do you recall Stuart
9 telling you about feedback he had gotten from
10 Jason?

11 A. I don't --

12 MR. GAGE: Objection.

13 A. Sorry.

14 MR. GAGE: I said objection.

15 A. I don't recall this -- I -- I recall
16 the general feedback between Sebastien and Jason.
17 I don't recall specially what came from Jason and
18 what came from Sebastien. The general feedback
19 was that they had a hard time understanding and
20 getting Ulku to articulate a vision for the
21 financial services industry, to articulate the
22 business needs that she felt the industry was
23 facing that Google Cloud could help with, and
24 they -- they were unclear whether she would be
25 able to lay out or she didn't demonstrate I guess

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2 that she would be able to lay out a product
3 mandate, for lack a better word, for the vertical.

4 And so that was the consistent
5 impression that I got from the interviews with
6 Sebastien and Jason, but I don't remember
7 specifically what each one of them said and I'm
8 not sure I was ever told specifically what each
9 one of them said.

10 Q. So if you -- let's break this down.
11 Who did you have conversations with regarding how
12 Ms. Rowe's interviews went?

13 MR. GAGE: Objection.

14 A. So I had a standing weekly meeting
15 with the leadership staffing team led by Stuart
16 Vardaman. In that standing weekly meeting, Stuart
17 would update me on the status of each of the
18 candidates in the pipeline. He would do that by
19 providing at least a verbal -- in some cases
20 bullet pointed, but in some cases a verbal summary
21 of the feedback that was provided from the
22 interviewers; and in some cases -- in many cases
23 he would say, I need your help chasing feedback
24 because I haven't gotten it yet. People get busy
25 and they don't necessarily send the e-mails that

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2 mentioned, she was one of many industry leads and
3 senior hires we were trying to hire at the time
4 or she was interviewing for one of the roles that
5 we were -- in one of the many roles that we were
6 interviewing for at the time. So I don't -- it --
7 it would not have been unlikely. I can't tell you
8 I didn't have a direct conversation with them, but
9 I don't have a specific recollection of them
10 sending me a Hangout message or a verbal
11 conversation or anything like that.

12 Jason's office and my office during
13 this time were across the hall from each other, as
14 an example, so we had casual conversations about
15 business in my office or in his office quite
16 frequently.

17 Q. Okay. Do you recall specifically
18 having a conversation with Stuart Vardaman
19 regarding the feedback from the interviews with
20 Ms. Rowe?

21 MR. GAGE: Objection.

22 A. As I just mentioned, I recall
23 having -- I rec -- I recall in the standing
24 meeting having Stuart tell me the feedback that
25 had come through the initial round of interview

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2 candidates, yes, and -- and including Ulku,
3 specific to Ulku, yes.

4 Q. And what do you recall him saying to
5 you specifically with respect to Ms. Rowe?

6 MR. GAGE: Objection.

7 A. So, as I -- as I just mentioned, he
8 said that the -- the interviews had happened. He
9 said that generally speaking people feel quite
10 comfortable with her technical capability, but
11 there were concerns around what I'll term
12 broadly as the -- as the business aspects of that;
13 meaning specifically her ability to articulate
14 a prop -- a vision for the industry, articulate
15 a value proposition for Google Cloud in the
16 industry that would be differentiated versus other
17 potential offerings in the industry that would be
18 translatable to a product level, which was really
19 one of the core things that we were solving for
20 was who could help us figure out what products to
21 build and how to position those in the market.
22 They did not see evidence, or they did not believe
23 I should say, coming out of the discussion that
24 Ulku demonstrated that she had the prod -- the
25 product vision or the ability to develop a product

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2 vision for the industry.

3 So there was no negative feedback.

4 There was only positive feedback on the technical
5 side and there were questions and concerns on the
6 nontechnical side, and I'll include product
7 management as the nontechnical in -- in that
8 description.

9 Q. Did Mr. Vardaman share with you from
10 where the feedback was coming, how he gathered
11 this feedback?

12 MR. GAGE: Objection.

13 A. I don't -- Stuart's normal expression
14 was I'm chasing everybody and here's what I got,
15 but I don't know in this case how he got the
16 feedback. I don't know what that would have
17 translated into in this case.

18 Q. When did he share that feedback with
19 you?

20 A. I -- it would have been the week or
21 two depending on when we met after that round of
22 interviews with Ulku, but I don't know even
23 roughly when that was. Yeah -- yeah, I don't know
24 when that was.

25 Q. Did he share with you that Vat liked

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2 A. It doesn't. I'm just trying to
3 remember. I have a very vague recollection of
4 telling Brian that several of the interviews
5 didn't go well, that there were some concerns
6 raised, but I can't -- but it's a very faint
7 recollection and I don't know, I -- I can't recall
8 anymore details about that conversation, but
9 that's the only one that's even vaguely coming to
10 mind.

11 Q. Give me just a moment.

12 Okay, I would like you to look in the
13 Box again and we're going to be looking at Tab 38.
14 We're going to mark it as Exhibit 35 and it has
15 the Bates stamp number GOOG-ROWE-00017533 through
16 38.

17 (Whereupon, Plaintiff's Exhibit 35
18 was marked at this time.)

19 Q. Do you recognize this document?

20 A. It appears to be an e-mail from me to
21 Sebastien Marotte.

22 Q. And is this the same Sebastien that
23 we have been discussing?

24 A. It is, yes.

25 Q. And do you see on Wednesday, August

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2 was viable for the role?

3 MR. GAGE: Objection, asked and
4 answered.

5 A. I -- again, I don't know the specific
6 timing what my view was. I know that it would be
7 after I received the feedback from Jason and
8 Sebastien, but I don't know that feedback in
9 relation to September 1st, 2018.

10 Q. What do you recall with respect to
11 Ms. Rowe interviewing with Diane Greene?

12 A. Once we decided that Ulku was not
13 going to be a finalist because of the interview
14 feedback that we had received, I moved into
15 retention mode because I did value Ulku and did
16 want her to join the team and to make the
17 transition that we had been trying to enact work;
18 and I thought that having a courtesy meeting with
19 Diane would be helpful in -- in assisting us in
20 retaining Ulku.

21 I suspected, and Ulku said at the
22 time, that if she didn't get the -- the FSI Lead
23 role that she would leave Google which is not an
24 outcome that I wanted to see because, as the
25 interviews noted, she was quite strong on the

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2 technical side of things. So the -- the Diane
3 meeting was meant to be part of an -- an attempt
4 to make her comfortable and happy with the role
5 that we did think she was a very good fit for.

6 Q. Did you tell her it was an interview
7 in connection with the VP of financial services
8 role?

9 A. The "her" in this case would be who?

10 Q. Ulku.

11 A. I don't know if I actually told Ulku
12 anything, except that we would schedule a meeting
13 with Diane. I'm not sure what -- what Stuart said
14 to her about it, but -- and it's certainly the
15 case that we did not close Ulku out at this point
16 and tell her that we didn't think she was a
17 finalist candidate in part. Because Brian did
18 feel so strongly about it, I wanted her to meet
19 Diane as I mentioned from a -- from a retention
20 standpoint, but if Diane thought we had the wrong
21 read on it that we might go back and take a look.
22 So we definitely did not tell Ulku that she was
23 not getting through to the next round as part of
24 setting up the meeting with Diane.

25 Q. Did Ulku tell you that she -- at the

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2 p.m. and we're back on the record.

3 Q. Mr. Shaukat, were -- the position
4 that Ms. Rowe was brought in to into your
5 organization, that was -- was that the global
6 client lead role?

7 A. I'm sorry, that she was brought into
8 my organization or into the organization?

9 Q. Into your -- into your organization.
10 What was -- what was the role that she was brought
11 into your organization?

12 A. I think the official title we gave it
13 was technical director of the global client team
14 or the financial services vertical.

15 Q. And was an informal term the -- the
16 global client lead?

17 A. No, it was global client technical
18 lead. It's a slightly -- it a more technical
19 version versus the business version.

20 Q. Okay. So there was a global
21 cli -- client technical lead and the global
22 what -- what was the other --

23 A. Sorry. There's a global client lead
24 which was not Ulku and then there's a global
25 client technical lead which was Ulku.

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2 A. Okay.

3 Q. Okay. We're going to mark this as
4 Exhibit 44, Bates stamped GOOG-ROWE-00017643.

5 (Whereupon, Plaintiff's Exhibit 44
6 was marked at this time.)

7 Q. Do you recognize this document?

8 A. I do. It appears to be a recap of my
9 conversation with Ulku that I provided to Kevin
10 Lucas and Fiona, who are my HR business partners.

11 Q. Okay, and so the first section that
12 has the tab, are those -- does that reflect what
13 you told Ulku in that conversation?

14 A. To the best of my recollection, yes.

15 Q. And so if you look at the third tab
16 down you say, "You know, I don't expect that she
17 would be a candidate there as on Her interviews,
18 people were impressed with her he technical
19 capabilities, but didn't feel that she has the
20 necessary depth breadth of experience on the
21 business side." Do you see that?

22 A. I do.

23 Q. And is that what you told Ms. Rowe
24 was the reason that she was not selected for the
25 position?

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2 A. I believe -- I believe what I told
3 her was that we were not filling the position, but
4 that if we were to reopen the position that this
5 would be the reason why we would not be moving
6 forward with her candidacy at that point.

7 Q. And was that the reason why you
8 wouldn't be moving forward with her candidacy?

9 A. It was.

10 MR. GAGE: Objection.

11 A. Yes, it is.

12 Q. You see that next line, "She
13 countered that she's the best person internally
14 and externally for the role and that you should
15 just give it to her"? Do you see that?

16 A. I do.

17 Q. Do you recall her making that
18 statement?

19 A. I don't recall the exact words, but I
20 recall her being fairly direct about the sentiment
21 expressed in there, yes.

22 Q. Was this a videoconference or an
23 in-person meeting or Hangout?

24 A. The -- what is written later on leads
25 me to believe it was a videoconference when it

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2 refreshes my recollection so I'm not sure I ever
3 internalized that, but it does suggest that it was
4 a week's notice.

5 Q. Okay. You can put that aside.

6 MR. GAGE: I'm sorry, did you say
7 something, Cara?

8 MS. GREENE: I said you can put that
9 aside.

10 MR. GAGE: Okay, I didn't hear.

11 Q. When did you decide that Stuart
12 Breslow would take over the head of financial
13 services role?

14 A. Well, to -- to be precise, I don't
15 agree that I decided that he would take over the
16 head of financial services role. I asked him to
17 play an interim role while we figured out what the
18 strategy of the financial services industry
19 would be, given some of the leadership changes
20 which -- which is quite different. We put
21 as -- as a earlier e-mail indicated, we had put
22 the strat -- the vertical strategy essentially on
23 pause when Thomas Kurian came in pending his
24 blessing, for lack of a better word. So -- so I
25 very specifically asked Stuart to be interim in

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2 charge of that while we figured out what the
3 long-term strategy and structure was going to be.

4 All of that said, that would have
5 been in I believe the November, 2018 time frame.
6 I don't recall exactly when in November it was.
7 It may have been late -- late October, but it was
8 in roughly that time frame.

9 Q. Okay, and the interim role that you
10 referenced, that's the head of financial services,
11 correct?

12 A. Yes, but I would just emphasize it
13 was not the job description that we were referring
14 to earlier. It was a caretaker role for the
15 existing team while we figured out what the future
16 scope was going to be for the vertical and for the
17 role.

18 Q. Was that before or after it was
19 communicated to Ms. Rowe that she would not be
20 receiving the head of financial services position
21 that you had -- that you made that decision?

22 MR. GAGE: Objection.

23 A. Can you repeat the question, please?

24 Q. Sure. The decision to put Stuart
25 Breslow in that role, did you make the decision

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2 before or after you communicated to Ms. Rowe that
3 she would not be getting the financial services
4 vertical lead role?

5 MR. GAGE: Objection.

6 A. That would be before, as I believe
7 the e-mail previously indicated. Meaning I had
8 decided that Stuart would be the interim lead
9 before I told Ulku that we were shutting down that
10 search and if we reopened it that she would not be
11 a candidate for it in -- in the future.

12 Q. Did you consider Ms. Rowe for the
13 interim position?

14 A. I -- I did consider Ulku as a
15 potential option for the interim role.

16 Q. When did you consider her as a
17 potential option?

18 A. Roughly in the same time frame as I
19 was -- as I indicated earlier, of making the
20 decision on -- on Stuart doing that role.

21 Q. Was there anyone else you considered
22 as a possibility for the interim role?

23 A. I don't believe so. I was looking at
24 the existing team, not bringing anyone else onto
25 to the team at the -- at that point. So it would

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2 have been the two of them who got the serious
3 con -- consideration for that.

4 Q. And why did you not select Ms. Rowe?

5 A. There were two reasons. One of them
6 was -- actually, there were three reasons, I'm
7 sorry.

8 One of them was the fact that I -- I
9 mentioned we were hitting pause on the financial
10 services strategy. The one area we were
11 continuing with at the same pace because we had
12 client engagements in the area was what I was
13 referred to earlier as the [REDACTED]
14 initiative that we were focused on. That was
15 something we had a long list of customers who were
16 interested. We believed we had a differentiated
17 value proposition, et cetera and we were close
18 to having agreement from a major financial
19 institution to move forward with that. So the
20 focus was going to be almost exclusively on that
21 and the [REDACTED] as we reduced scope in
22 this holding pattern that I was -- that I'm
23 describing.

24 Stuart is a recognized authority on
25 anti-money laundering. He's, I -- I would

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2 say -- one client actually referred to him as icon
3 in the space and so he is somebody who has deep
4 knowledge of how that works, how it should work,
5 and what could be done due improve it. So there
6 was that consideration from a content standpoint.

7 There was a second consideration that
8 was from a level standpoint, that Stuart was a
9 Level 9 and Ulku was a Level 8 and Leonard the
10 other person on the team at a senior level was a
11 Level 6 or 7, I can't remember which, and it would
12 have been very unusual inside of Google to
13 have what Google refers to as an inversion.
14 Particularly on an interim basis, it would have
15 been very unusual to do that; and an inversion is
16 when you have someone at a lower level report to
17 someone at a higher level. So there was that
18 consideration that Ulku was Level 8 and Stuart was
19 Level 9 and, as I mentioned, Leonard was Level 6 I
20 think. So the second.

21 And the third, I -- I wouldn't -- I
22 -- I would characterize this one as -- as a lower
23 consideration, but I was concerned about the
24 messaging of -- or "messaging" is the wrong
25 word -- the expectations I would be setting if I

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2 needed in this context.

3 Q. Tell me how it came to be that Ms.
4 Rowe left your organization.

5 A. So the prediction that she would not
6 be happy working on the team with Stuart leading
7 it proved to be true and she would from time to
8 time air her frustration either to him or to me or
9 would continue to show up in an uncoordinated way
10 at clients where -- as I mentioned earlier, one of
11 the things that we had asked the global client
12 technical leads to do was to focus on a specific
13 set of clients. It was very hard to get Ulku to
14 show up on a consistent basis at a very specific
15 set of clients.

16 We asked that she not do the
17 level of speaking engagements that she was doing
18 because -- this is something I asked all the team
19 because I viewed it as a waste of time with
20 limited resources to be traveling internationally
21 for days or weeks to give a lot of the speeches
22 that we were giving, et cetera.

23 She was expressing a lot of
24 dissatisfaction with that and so I finally give
25 her an option that I had not given to any of her

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2 peers who had moved over, which was that if she
3 agreed to focus -- and I -- I did this in concert
4 with Will Grannis. If she agreed to focus on --
5 on a horizontal, as we called it, as opposed to on
6 a vertical that I would be okay with her moving
7 back into OCTO; and, again, that is an option we
8 made exclusively available to her. We didn't make
9 it available to Ben Wilson, who had some of the
10 same struggles, and we did not make it available
11 to Jeff Kember, but we did as a way to try and
12 resolve some of the issues that Ulku had.

13 Now I'm recalling, as I'm saying
14 this, that she did ask for clarification on what
15 her options are and I believe I laid out a couple
16 of options for her, one of which was -- I -- I'm
17 trying to recall exactly, but I want to say one of
18 them was continuing building out the team around
19 the technical -- well, the client lead role or
20 global client technical lead role, I should say.
21 The second is to do more of an individual
22 contributor type of role, which had been her role
23 in OCTO at the time. Or the third is to take this
24 horizontal role in OCTO. There was some set of
25 options that I tried to craft for her so that she

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2 would have some ability, again more than I offered
3 any of her peers, to -- to craft a path that she
4 was happy with.

5 She expressed some -- she had
6 expressed a point of view that -- that the options
7 I was presenting her, I don't -- I can't -- I
8 don't recall if it was all of the options or one
9 of the options would in effect be a demotion,
10 which was not the case in my opinion, and as a
11 result of that she opted to go back into OPTO
12 focusing on what is called hybrid Cloud as opposed
13 to on financial services; and she and Will reached
14 that decision independently of me. I blessed it,
15 meaning I agreed to give Will the headcount for
16 that role so he didn't have to find additional
17 budget for it, but that decision was between Ulku
18 and -- and Will.

19 Q. Did you ever communicate to Ms. Rowe
20 that she was reporting in to Mr. Breslow?

21 A. I assume I did. I don't have a
22 recollection specifically of doing so, but I do
23 assume that I -- that I did.

24 Q. But you don't have a recollection --

25 A. But I --

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2 Q. And it was also clear that if she
3 went back to OCTO it was in a horizontal role and
4 not a vertical role, correct?

5 A. That is correct. I was not going to
6 undo the org changes that we had made, correct.

7 Q. So she would -- she couldn't be
8 financial services focused if she went back to
9 OCTO, correct?

10 A. Correct.

11 Q. Once she moved back into OCTO, did
12 you have any other communications with her?

13 A. With her directly, I don't recall
14 any.

15 I do recall continuing complaints
16 about her showing up in a financial services
17 capacity and causing confusion with the industry
18 team, including doing interviews in which she was
19 described as the financial services CTO and areas
20 like that that was in violation of the agreement,
21 if you will, that Will and I had had.

22 I don't know that I ever spoke to her
23 directly about -- about that. I do remember
24 speaking to Will and their PR team and our market
25 team about it, but I don't know if I ever spoke to

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2 remember sitting here today that we've not
3 discussed?

4 MR. GAGE: Objection. About
5 anything?

6 Q. Sitting here today, any
7 communications about Mr. Rowe --

8 MR. GAGE: Ah.

9 Q. -- that you and I have not discussed?

10 MR. GAGE: Ah, you left off that
11 little critical piece.

12 MS. GREENE: What would I do without
13 you, Ken.

14 MR. GAGE: Just -- just here to make
15 sure the form of your question is right.

16 A. No, there's nothing that I can think
17 of sitting here today.

18 Q. Okay. How did it come to be that you
19 left Google?

20 A. So Thomas Kurian joined as CEO of
21 Google Cloud in November of 2018. He and I got
22 along quite well and despite the fact he changed
23 out most of the leadership team at Google Cloud, I
24 was still, there still in my role doing my thing.
25 I'm one of the few who -- who sort of made that

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2 transition.

3 It was clear in my conversations with
4 Thomas that he had some changes he wanted to make
5 to the organization, specifically as it related to
6 industries. I had set up, as we've touched on,
7 what I refer to as a general management structure
8 where I had business technology, meaning product
9 engineering, all in one place. Thomas for other
10 parts of -- of Cloud was moving to a different
11 model that had a -- had a -- a stronger line
12 between technology and business. There were -- I
13 -- I would say my team was the last one that he
14 focused on from that standpoint, but in late 2019
15 he and I started talking about whether it made
16 sense to break my vertical teams up into a
17 technical piece, meaning product and engineering,
18 and go-to-market piece, and we decided it did.

19 And in that role, I didn't have much
20 interest in just running the business side of it.
21 It was clear in Google that the product and
22 engineering pieces would better live with our AI
23 team, that it was a more natural home for them if
24 you were to break it apart, and so we moved the
25 engineering team and then the product team over a

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2 period of six to nine months over to the -- the AI
3 team. We -- I told Thomas I was not interested in
4 doing a role that -- that was purely business
5 development, not -- was not furthering my career
6 and I wasn't interested in doing it. So I moved
7 that part to Rob Enslin who was the president of
8 sales at this time.

9 And then Thomas and I started
10 thinking about other roles that I could play in
11 Cloud. It became clear there wasn't one that met
12 -- you know, where there was a natural need and
13 would fulfill what I wanted to do from a career
14 standpoint, et cetera and so then I started
15 talking to other groups inside of Google about
16 other roles, and COVID hit and things inside of
17 Google slowed down, and things outside started to
18 heat up because there was a leak that -- that I
19 was leaving Cloud and so that resulted in a lot of
20 inbound phone calls from people.

21 And I ended up deciding in probably
22 June of 2020 to accept an external offer and
23 to -- and to leave Google, which I did in July of
24 2020.

25 Q. Did you enter into any sort of